



West River Cooperative Telephone Co.

801 Coleman Ave. P. O. Box 39 Bison, SD 57620

June 13, 2012

Sent via Hand Delivery

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
Attention: Lorenzo Miller or John Emmett
445 12th Street, S.W.
Washington, D.C. 20554

RE: Expedited Waiver Request of West River Cooperative Telephone Company to Correct Erroneous Study Area Boundaries Used in the Regression Analysis Calculations

Dear Ms. Dortch:

Pursuant to 47 C.F.R § 1.3, West River Cooperative Telephone Company, Inc. ("West River") respectfully submits this expedited Petition for Waiver. In the Order released on April 25, 2012, the Commission adopted a streamlined, expedited waiver process for carriers affected by the benchmarks to correct any errors in the study area boundaries.

In accordance with Paragraph 29 and Appendix C of the above-referenced Order, West River hereby provides the Commission with a CD-R containing a WinZip archive with the requisite shapefiles and a corresponding readme file. West River believes that the submission of this information complies with the Commission's file specifications outlined in Appendix C.

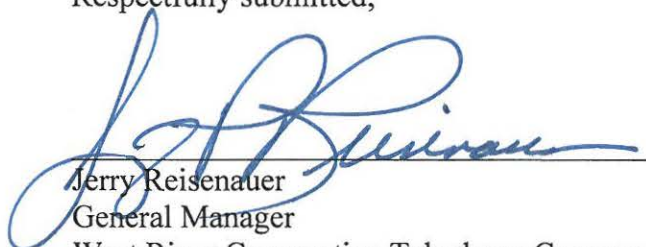
The files provided to the Commission today also support the multiple advocacy efforts made by West River in 2012 to modify the Commission's erroneous input file from 260.557 square miles to reflect the actual size of West River's service area at which time it was believed that the service area spanned 6,209 square miles. On April 10, 2012, at the request of the Wireline Competition Bureau, West River filed additional data, including a study area map and affidavit from the South Dakota Public Utilities Commission attesting to the square mileage of West River's South Dakota study area to support West River's request of a correction to the data inputs used in the regression analysis calculations. A copy of the April 10th filing is included with this submission. Since that time, additional research has been completed using the most recent maps of West River's South Dakota, North Dakota and Montana service areas, all of which fall under Study Area Code 391689, and it has been determined that the Study Area spans 6,256.825 square miles. Of the 6,256.825 square miles served by West River, 192.67 square miles of the Lemmon Exchange lies within the confines of the Standing Rock Indian Reservation

and 194.99 square miles of the Meadow Exchange lies within the confines of the Standing Rock or Cheyenne River Indian Reservations.

In regard to the expedited waiver process, it is the understanding of West River that the Commission will review the submitted files to determine whether special circumstances (*i.e.*, inaccurate boundaries) support granting West River's petition for waiver. If the Commission grants West River's petition for waiver, West River further understands that it will be exempt from the caps for 2012 and 2013. West River also presumes that the Commission will update its input files with the boundary data provided by West River prior to rerunning the regression to calculate capex and opex limits that will be used for calculating support for 2014.

As General Manager and certifier of West River Cooperative Telephone Company, I certify under penalty of perjury that the information provided in the enclosed shapefiles accurately portrays the square mileage based on the most recent maps filed with the Public Service and Public Utilities Commissions in the states of South Dakota, North Dakota and Montana.

Respectfully submitted,



Jerry Reisenauer
General Manager
West River Cooperative Telephone Company

Encl.